

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

HENRY E. LYONS,

Plaintiff,

v.

Case No. 4:13-cv-00897-ODS

LEO E. MORTON, et al.,

Defendants.

UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW, Henry E. Lyons (“Plaintiff”), by and through his attorneys of record, and requests a ten (10) calendar day extension, until on or before October 10, 2013, by which to respond to Defendants’ Motion to Dismiss. In support of this motion, Plaintiff states as follows:

1. On September 19, 2013, Defendants filed a Motion to Dismiss (Doc. No. 2) with Suggestions in Support (Doc. No. 3).
2. Plaintiff’s Suggestions in Opposition are due on or before September 30, 2013, unless otherwise directed by the Court.
3. In order to allow Plaintiff and his counsel additional time by which to consider and properly respond to Defendants’ pending motion, Plaintiff requests an additional ten (10) calendar days to respond, until on or before October 10, 2013.
4. Plaintiff makes this motion without the purpose or intent to delay and this proposed extension will work no prejudice on any party.
5. Defendants have confirmed that they have no objection to this motion for an extension of time.

WHEREFORE, for the reasons stated herein, Plaintiff respectfully requests that the Court grant this unopposed motion for an extension of time, and allow Plaintiff until on or before October 10, 2013 to respond to Defendants' motion to dismiss.

Dated: September 27, 2013

Respectfully submitted,

McCLELLAND LAW FIRM
A Professional Corporation

By: s/Ryan L. McClelland
Kelly L. McClelland, MO Bar #27156
Kenneth E. Cox, MO Bar #51861
Jerome M. Patience, MO Bar #51965
Ryan L. McClelland, MO Bar #59343
The Flagship Building
200 Westwoods Drive
Liberty, Missouri 64068-1170
Telephone: (816) 781-0002
Facsimile: (816) 781-1984
kmclelland@mcclellandlawfirm.com
kcox@mcclellandlawfirm.com
jpatience@mcclellandlawfirm.com
ryan@mcclellandlawfirm.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Michael L. Blumenthal, Esq.
Deena B. Jenab, Esq.
Seyferth Blumenthal & Harris LLC
4801 Main Street, Suite 310
Kansas City, Missouri 64112
mike@sbhllaw.com
deena@sbhllaw.com

By: s/Ryan L. McClelland

ATTORNEYS FOR PLAINTIFF